

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg (Charlottesville) Division

In Re: William S. Zeller, Debtor	CASE NO. 14-60622 CHAPTER 7
MOTION TO STAY/QUASH GARNISHMENT/COURT PROCEEDINGS	

Comes now your applicant, William S. Zeller (“Applicant” or “Debtor”), by counsel, pursuant to Bankruptcy Code 362(a), and respectfully represents:

1. That your applicant has filed its petition for relief under Chapter 7 of Title 11 of the United States Code on 4/3/14;
2. That your applicant was subject to a garnishment issued by City of Richmond Gen Dist Ct., 400 N 9th Street, Ste 203, Richmond, VA on 2/12/14;
3. That said garnishment was in favor of Union First Market Bank, 24010 Partnership Blvd, Ruther Glen, VA 22546;
4. That the garnishment demanded was for \$11,927.04 and is for a judgment dated 1/16/2014;
5. The garnishee is applicant’s employer, University of Virginia, Attn Peggy Johnson, 914 Emmett Street, Charlottesville, VA 22904;
6. That approximately \$803.00 has been garnished in the 90-day period preceding this bankruptcy.

WHEREFORE, your applicant respectfully prays that (i) said garnishment be quashed; (ii) that said garnished funds be deemed a preference payment under applicable bankruptcy law; (iii) that said garnished funds be returned to applicant forthwith; and (iv) that the applicant have such relief as the nature of its case may require.

Copies hereof are directed by mail to the debtor/applicant, creditor, and employer at the addresses listed above.

DATE: 4/3/14 Respectfully submitted,
William S. Zeller

/s/ Alexis I. Crow
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